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Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
12<sup>th</sup> Street Lobby – TW-A325  
Washington, DC 20554

Re: Amendment of Section 73.202(b)  
RM Table of Allotments  
FM Broadcast Stations  
(Haddock & Milledgeville, Georgia)

Dear Ms. Salas:

Transmitted herewith on behalf of Bernice P. Hedrick is an original and four copies of her Petition of Rulemaking seeking the commencement of a rulemaking proceeding to amend the FM table of allotments to allot Channel 264A as its first aural service to Haddock, Georgia, and substitute Channel 234A for 264A at Milledgeville, Georgia.

Should any questions arise concerning this matter, please contact me directly.

Sincerely,



H. David Hedrick  
P O Box 27  
317 Stonegables Court  
Gray, Georgia 31032  
478-986-4435

Enclosures

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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

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FEB 23 2001

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In the Matter of

Amendment of Section 73.202(b),  
FM Broadcast Stations  
(Haddock and Milledgeville, Georgia)

RM-\_\_\_\_\_

To: Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau

**PETITION FOR RULEMAKING**

The undersigned hereby petitions the Federal Communications Commission for the initiation of a rulemaking proceeding to amend the FM Table of Allotments (Section 73.202(b) of the Commission's Rules) to assign FM Channel 264A as it's first aural service to Haddock, Georgia, as follows:

City	Present	Proposed
Haddock, Georgia	None	264A
Milledgeville, Georgia	264A, 272A	234A, 272A

1. Haddock, Georgia has a 1990 U.S. Census population of 750 persons and is located in Jones County (population 22,700 persons). Haddock has its own zip code (31033) and post office. Haddock students attend the Jones County consolidated school system located six miles away. Haddock has it's own bank. Churches include Mitchell Zion Baptist, Ellis Chapel Baptist, Jordan Chapel AME, First New Salem Baptist, County Line Baptist and Adams Tabernacle CME. There are numerous civic and social clubs. The primary area employment is in the form of service industries,

stone quarries and agriculture.

2. As indicated in the attached Engineering Statement (attached hereto as Exhibit 1), Channel 264A can be assigned to Haddock using the reference site coordinates of 33-07-48N, 83-22-35W (NAD27). At the reference site, all minimum distance separation requirements of Section 73.202(b) of the Rules are met, as well as the principal community contour coverage requirements of Section 73.315. In order for 264A to be assigned to Haddock, Georgia it is necessary to substitute Channel 234A to Milledgeville, Georgia, as shown in the accompanying technical study.

3. In the event that Channel 264A is allotted to Haddock, Georgia, the undersigned, or an entity in which she participates, will file an application for a Construction Permit to operate a new FM broadcast station at Haddock and, if authorized, will build the station promptly.

Dated: February 14, 2001

Respectfully submitted,

By Bernice P. Hedrick  
Bernice P. Hedrick  
P O Box 27  
317 Stonegables Ct.  
Gray, Georgia 31032  
478-986-4435

## **EXHIBIT 1**

1. This engineering exhibit supports a petition to amend the FM Table of Allotments (Section 73.202(b) of the Commission's Rules) to assign FM Channel 264A to Haddock, Georgia.
2. In order to assign 264A to Haddock, it is necessary to substitute Channel 234A to Milledgeville, Georgia. Table 1, attached, is an allocation study for Channel 234A using the licensed coordinates of WLRR (33-06-50N, 83-13-08W). This study shows clearly that 234A will work as a 3 kw assignment at this site. Figure I shows 234A compliance at this site with Section 73.315.
3. Table 2, attached, is an allocation study for the use of Channel 264A for Haddock using the coordinates (33-07-48N, 83-22-35W). This site, some 14 km North-northeast of Haddock is necessary to avoid a short space to station WPGA (265A @ 32-33-20N, 83-44-14W). It should be noted that the short spacings numbered 1, 2 and 3 on this study no longer exist due to the Commission's Memorandum and Order MM Docket #98-112, RM-9027, RM-9268, RM-9384 released February 9, 2001. At the reference site, all minimum distance separation requirements of Section 73.202(b) of the Rules are met, as well as the principal community contour coverage requirements of Section 73.315 (Figure 2).

## **SUMMARY**

Based upon the information contained herein we respectfully petition the Commission

to amend the FM Table of Allotments (Section 73.202(b) of the Commission's Rules)  
as follows:

- A. Delete Channel 264A at Milledgeville, Georgia.
- B. Substitute Channel 234A at Milledgeville, Georgia, specifying operation  
of Station WLRR on this Channel. (If successful in obtaining a Construction  
Permit the petitioner has indicated her willingness to reimburse WLRR for  
reasonable expenses in connection with the move from 264A to 234A.)
- C. Allocation of Channel 264A to Haddock, Georgia as it's first aural service.

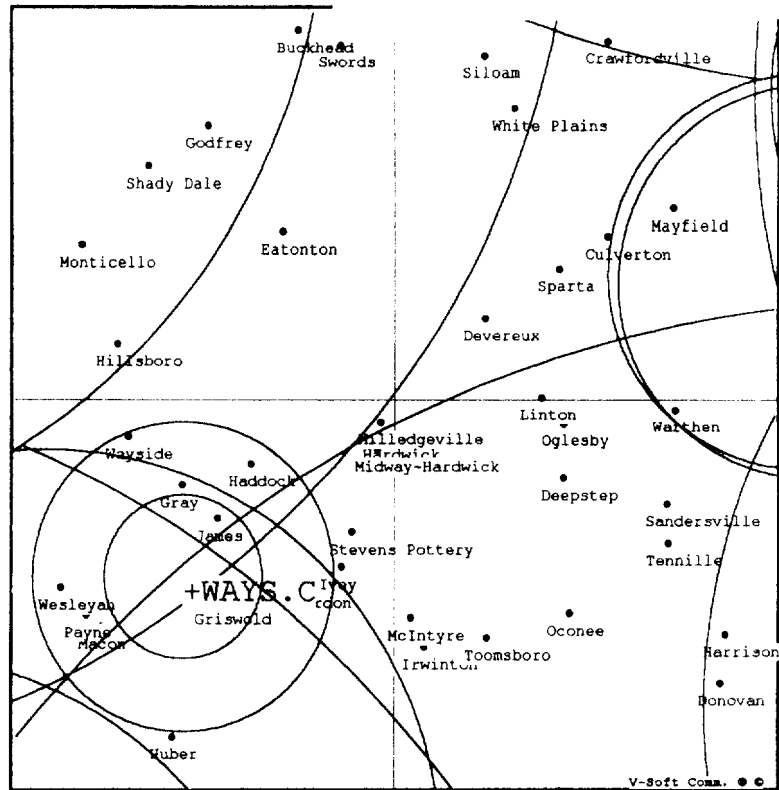
TABLE 1

234A @ WLRR site

FMCONT<sup>(TM)</sup> LOCATE STUDY

Ch 234 A  
94.7 MHz

N. Lat. 33 06 50  
W. Lng. 83 13 08



Call	CH#	Location		D-KM	Azi	FCC	Margin
WPCH	235C1	Atlanta	GA	129.60	306.8	129.0	0.60
WBYZ	233C	Baxley	GA	164.00	153.8	161.0	3.00
WAYS	287C1	Macon	GA	38.10	230.7	21.0	17.10
WEGF.A	236C2	Montezuma	GA	78.67	218.1	55.0	23.67
WAYS.C	288C3	Macon	GA	38.10	230.7	11.0	27.10
WDECFM	234C3	Americus	GA	169.68	217.5	138.0	31.68
WSTR	231C	Smyrna	GA	126.13	305.0	94.0	32.13
AVAC	232A	Gibson	GA	59.36	73.0	27.0	32.36
960916	232A	Gibson	GA	60.37	74.6	27.0	33.37
WHKN	235C3	Millen	GA	133.78	108.1	84.0	49.78
WMUUFM	233C	Greenville	SC	215.99	19.9	161.0	54.99
R---	233A	Woodbury	GA	119.36	259.4	64.0	55.36
WAAW	234A	Williston	SC	160.62	75.0	105.0	55.62
AVAC	236C2	Montezuma	GA	113.64	218.0	55.0	58.64
WCHZ	236C3	Harlem	GA	103.28	66.1	42.0	61.28

Dave Hedrick      Bernice Hedrick

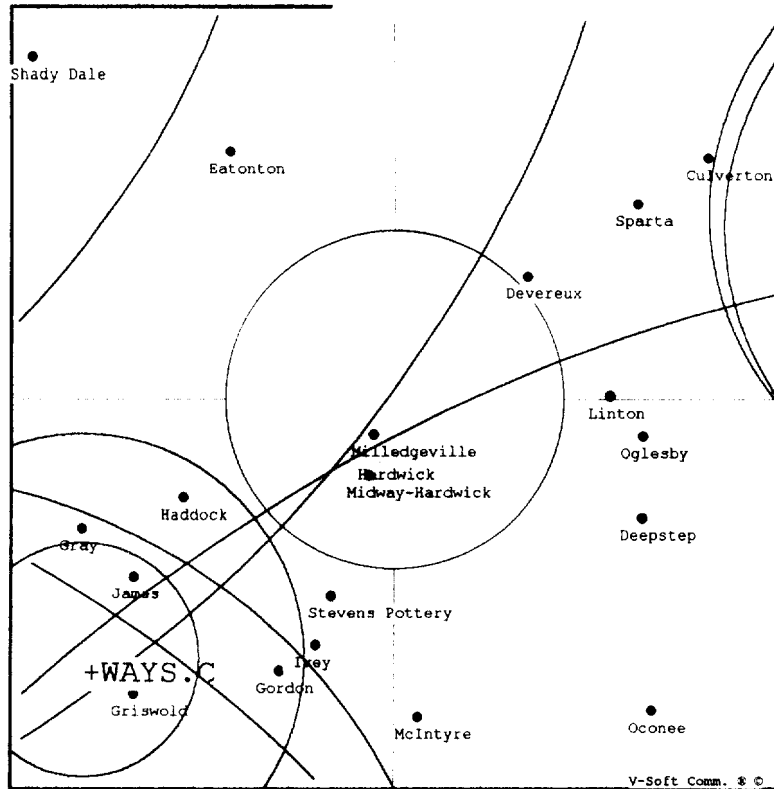
# FIGURE 1

WLRR/234A/70dBu

FMCONT<sup>(TM)</sup> LOCATE STUDY

Ch 234 A  
94.7 MHz

N. Lat. 33 06 50  
W. Lng. 83 13 08



Call	CH#	Location		D-KM	Azi	FCC	Margin
WPCH	235C1	Atlanta	GA	129.60	306.8	129.0	0.60
WBYZ	233C	Baxley	GA	164.00	153.8	161.0	3.00
WAYS	287C1	Macon	GA	38.10	230.7	21.0	17.10
WEGF.A	236C2	Montezuma	GA	78.67	218.1	55.0	23.67
WAYS.C	288C3	Macon	GA	38.10	230.7	11.0	27.10
WDECFM	234C3	Americus	GA	169.68	217.5	138.0	31.68
WSTR	231C	Smyrna	GA	126.13	305.0	94.0	32.13
AVAC	232A	Gibson	GA	59.36	73.0	27.0	32.36
960916	232A	Gibson	GA	60.37	74.6	27.0	33.37
WHKN	235C3	Millen	GA	133.78	108.1	84.0	49.78

Dave Hedrick      Bernice Hedrick

TABLE 2

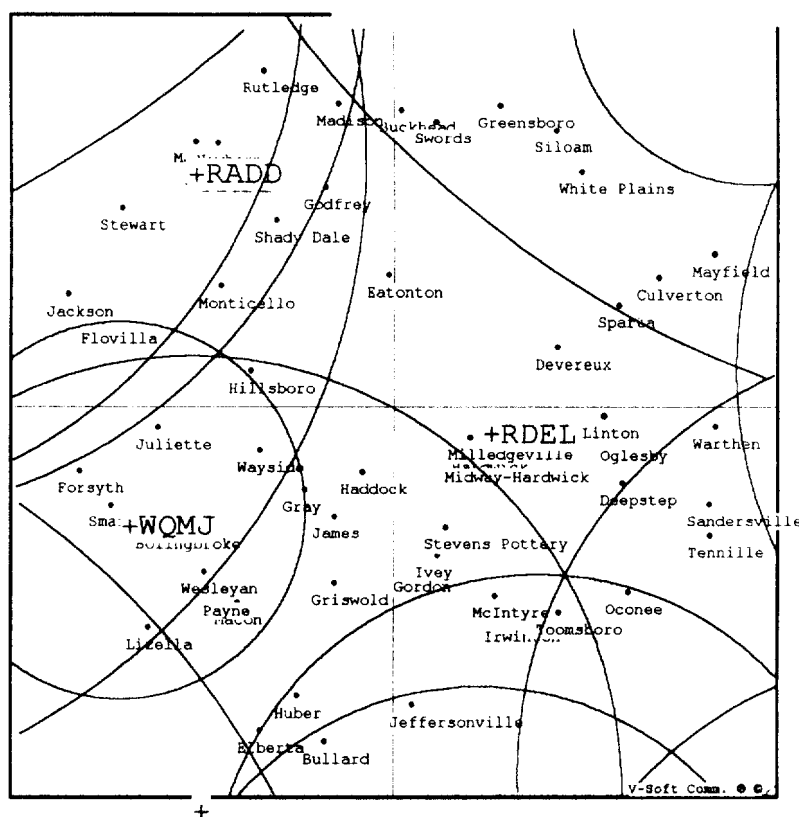
264A usable area

FMCONT<sup>(TM)</sup> LOCATE STUDY

Ch 264 A  
100.7 MHz

N. Lat. 33 07 48

W. Lng. 83 22 35



Call	CH#	Location		D-KM	Azi	FCC	Margin
WLRR	264A	Milledgeville	GA	14.81	96.9	115.0	-100.19
*1) RDEL	264A	Milledgeville	GA	14.81	96.9	115.0	-100.19
*2) RADD	264C3	Covington	GA	52.40	317.3	142.0	-89.60
*3) RADD	264C3	Social Circle	GA	53.13	319.1	142.0	-88.87
WPGA FM	265A	Perry	GA	72.11	207.9	72.0	0.11
AVAC	263C2	Anniston	AL	117.96	290.2	106.0	11.96
WWWQ.A	263C2	Anniston	AL	117.96	290.2	106.0	11.96
WQMJ	261A	Forsyth	GA	48.99	249.4	31.0	17.99
WWWQ.C	263C3	Anniston	AL	117.18	307.0	89.0	28.18
WQIL.A	267C2	Chauncey	GA	86.29	163.8	55.0	31.29
WSSLFM	263C	Gray Court	SC	198.20	35.7	165.0	33.20
RADD	263C3	College Park	GA	125.83	304.1	89.0	36.83
WXRSEFM	263A	Swainsboro	GA	110.82	123.2	72.0	38.82
WQIL.C	267C2	Chauncey	GA	102.25	172.0	55.0	47.25
WMRZ.C	264C3	Cuthbert	GA	195.71	227.4	142.0	53.71
WAEJ	265A	Waynesboro	GA	129.45	87.2	72.0	57.45
WXKT	261A	Washington	GA	90.38	42.2	31.0	59.38
WUSY	264C	Cleveland	TN	289.98	323.3	226.0	63.98
WTGA FM	266A	Thomaston	GA	101.86	253.3	31.0	70.86
WLYU	265A	Lyons	GA	145.43	140.7	72.0	73.43

\* 1,2,3 petitions dismissed (See MM docket #98-112, RM-9027, RM-9268, RM-9384)



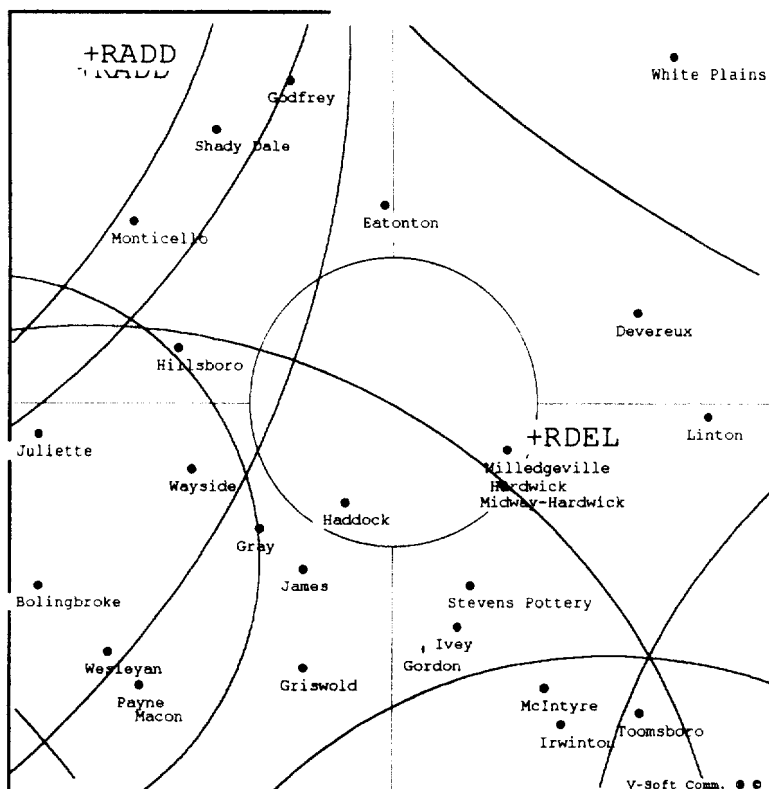
# FIGURE 2

Haddock264A 70dBu

FMCONT<sup>(TM)</sup> LOCATE STUDY

Ch 264 A  
100.7 MHz

N. Lat. 33 07 48  
W. Lng. 83 22 35



Call	CH#	Location		D-KM	Azi	FCC	Margin
WLRR	264A	Milledgeville	GA	14.81	96.9	115.0	-100.19
RDEL	264A	Milledgeville	GA	14.81	96.9	115.0	-100.19
RADD	264C3	Covington	GA	52.40	317.3	142.0	-89.60
RADD	264C3	Social Circle	GA	53.13	319.1	142.0	-88.87
WPGAFM	265A	Perry	GA	72.11	207.9	72.0	0.11
AVAC	263C2	Anniston	AL	117.96	290.2	106.0	11.96
WWWQ.A	263C2	Anniston	AL	117.96	290.2	106.0	11.96
WQMJ	261A	Forsyth	GA	48.99	249.4	31.0	17.99
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WQIL.A	267C2	Chauncey	GA	86.29	163.8	55.0	31.29
WSSLFM	263C	Gray Court	SC	198.20	35.7	165.0	33.20
RADD	263C3	College Park	GA	125.83	304.1	89.0	36.83
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WMRZ.C	264C3	Cuthbert	GA	195.71	227.4	142.0	53.71
WAEJ	265A	Waynesboro	GA	129.45	87.2	72.0	57.45
WXKT	261A	Washington	GA	90.38	42.2	31.0	59.38
WUSY	264C	Cleveland	TN	289.98	323.3	226.0	63.98
WTGAFM	266A	Thomaston	GA	101.86	253.3	31.0	70.86
WLYU	265A	Lyons	GA	145.43	140.7	72.0	73.43

Dave Hedrick      Bernice Hedrick

## **CERTIFICATE OF SERVICE**

I, H. David Hedrick, hereby certify that on February 15, 2001 the foregoing document is being served by First Class Mail, postage prepaid, to the following:

Preston W. Small  
185 Ivey-Weaver Road  
Milledgeville, GA 31061  
(Licensee of WLRR)

A handwritten signature in cursive script, appearing to read "H. David Hedrick", written over a horizontal line.

H. David Hedrick

## CERTIFICATION

State of Georgia    )  
City of Gray        )  
Jones County        )

H. David Hedrick, under penalty of perjury, declares and says:

That he is a radio broadcast consultant, active in the industry for four decades; having obtained a First Class (currently General) FCC license in 1961. Since Docket 80-90 he has had numerous petitions for FM rulemakings accepted by the Commission.

That he personally prepared the attached petition and exhibits. All material and exhibits hereto, are believed to be true and correct, as of the date of this writing.



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H. David Hedrick  
Gray, Georgia  
DATED: February 14, 2001